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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 United States of America,

14 Case No. 2:06-cr-00160-APG-RJJ

15 Respondent/Plaintiff,

16 **Motion to Seal (Exhibits A and D)**

17 v.

18 Falasha Ali,

19 Petitioner/Defendant.

20 Falasha Ali respectfully moves this Court for the entry of an Order  
21 permitting him to file (1) Exhibit A under seal because it contains confidential  
22 medical information; and (2) Exhibit D under seal because it contains letters from  
23 minors and letters with personal data identifiers requiring redaction. *See* FED. R.  
24 CIV. P. 5.2(d) and Local Rule IA 10-5; FED. R. CRIM P. 49.1 and Local Rule IC 6-1.

25 While public access to judicial filings and documents is favored, see *Nixon v.*  
26 *Warner Commc'ns, Inc.*, 435 U.S. 589, 597 (1978), a party may have a judicial record  
sealed by demonstrating “compelling reasons” that outweigh the public policy  
favoring disclosure, including that the records may be used improperly, *see*  
*Kamakana v. City and Cnty. of Honolulu*, 447 F.3d 1172, 1178-79 (9th Cir. 2006).

27 In this case, Exhibit A comprises medical records. The record contains  
28 sensitive and private information relating to Mr. Ali’s health and medical care.

1 Exhibit D contains letters with personal data identifiers, as well as letters sent from  
2 Mr. Ali's minor children. The records should thus be sealed to protect his privacy  
3 and the identification information of those writing letters of support, including his  
4 minor children.

5 Given the nature of the information provided in Exhibits A and D, Mr. Ali  
6 respectfully asks this Court to permit him to file the exhibits under seal in this Court.

7 Dated April 26, 2021.

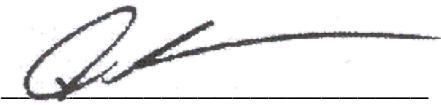
8 Respectfully submitted,

9  
10 Rene L. Valladares  
Federal Public Defender

11 /s/ Katherine Tanaka  
12 KATHERINE TANAKA  
13 Assistant Federal Public Defender

14  
15 IT IS SO ORDERED:

16 Dated: April 29, 2021

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19 ANDREW P. GORDON  
20 UNITED STATES DISTRICT JUDGE  
21 Case No. 2:06-cr-00160-APG-RJJ